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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GPI, LLC, v. DOGGONE GEESE, INC. AND CATHY P. BENEDICT	Plaintiff, Defendants.	Civil Action No. 3:18-cv-5122 (FLW) (TJB) <i>Document electronically filed</i> <u>DECLARATION OF REBECCA GIBSON IN SUPPORT OF APPLICATION OT SHOW CAUSE PURSUANT TO FED. R. CIV. PRO. 65</u>
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REBECCA GIBSON, of full age declares:

1. I am an individual residing in Stanfield, North Carolina.
2. I am a certified Wildlife Damage Control Agent for the State of North Carolina.
3. I am the owner and founder of Flyway Geese which has offered goose management services using highly trained, skilled Border Collies for over 20 years.
4. We train Border Collies to humanely remove birds and other wildlife from golf courses, airports, beaches, estates, colleges, universities, parks, playgrounds, cemeteries, and other corporate and residential facilities.

5. All of our dogs are certified by the North American Goose Dog Association.
6. Flyaway Geese also offers fully trained dogs for sale to property owners who wish to do their own goose management.
7. I have sold 8 fully trained and certified goose dogs to GPI in the past year.
8. In the spring of 2016, I was approached by Cathy Benedict (“Benedict”) who was interested in purchasing some of my dogs. She stated that she wanted “low end,” “less expensive” dogs which had just begun their training and that she would finish the training and sell them to fellow Geese Police franchisees.
9. Benedict asked me not to tell anyone that I had sold any dogs to her.
10. I provided Benedict with two untrained dogs in the spring of 2016.
11. On the day she received the two dogs, she sent the first directly to a Geese Police franchisee in Washington, DC suggesting that the untrained dog that I had provided was a fully trained goose dog, which it was not.
12. With respect to the second dog, I made clear to Benedict, in front of a North Carolina Geese Police franchisee, that the dog had a food aggression problem which would need extensive training to correct.
13. Benedict called me the following day, to say that the dog had bitten her after she had attempted to fix his food aggression problem. She sent that dog back to North Carolina via the North Carolina Geese Police franchisee who returned the dog to me after several days.
14. I understand that she sold the first dog to another Geese Police franchisee after it was returned to her by the DC Geese Police franchisee suggesting that she had trained the dog to be a goose control dog.
15. Benedict was acting like a dog broker. She was buying dogs for \$2,000-\$2,500 dollars and attempting to sell them immediately for several thousand dollars more while misrepresenting the dogs as being fully goose “trained,” when they are not.
16. My name and reputation were built on the quality of my trained and certified goose dogs. I will never sell another dog to Benedict based upon my experience with her.

Dated: May 2018



Rebecca Gibson